

GHAJAR EXHIBIT 61

11/18/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, ET AL.,)
INDIVIDUAL AND REPRESENTATIVE)
PLAINTIFFS,) LEAD CASE NO.
v.) 3:23-cv-03417-VC
META PLATFORMS, INC.,)
DEFENDANT.)

)

* * * H I G H L Y C O N F I D E N T I A L * * *
* * * A T T O R N E Y S ' E Y E S O N L Y * * *

VIDEO-RECORDED DEPOSITION OF
ALEXANDER BOESENBERG
MONDAY, NOVEMBER 18, 2024
SAN FRANCISCO, CALIFORNIA
9:04 A.M. PST
REPORTED BY AUDRA E. CRAMER, CSR NO. 9901

DIGITAL EVIDENCE GROUP
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1 Q. Okay. Now, [REDACTED] actually gave
2 you a number for each book that -- a price temp
3 for each book to license; right? That Meta
4 wanted to license; right?

5 A. I mean, this looks -- that appears to
6 be the case here, but, again, you know, as I've
7 said, it's just one -- it's like -- it's a price
8 for a volume of books, but I don't know all of
9 the other important details.

10 Q. Right. But, you know, what was the
11 price that [REDACTED] -- well, [REDACTED]
12 offers -- or at least from this message, offered
13 prices for two types of books; right?

14 A. Yes.

15 Q. All right. What are the two types?

16 A. Romance books and fiction books.

17 Q. Okay. And what was [REDACTED]
18 opening offer or offer at this time for
19 licensing a romance book?

20 A. Well, I think this document implies
21 that it was \$10,000 per romance book and \$30,000
22 per fiction book.

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1 [REDACTED] relayed to you?

2 A. I can't remember the conversation, but
3 I believe so.

4 Q. Okay.

5 A. I mean, I -- you know, I have no reason
6 to think this bullet is incorrect.

7 Q. Okay. Now, a deal with [REDACTED]

8 was never consummated; right?

9 A. Correct.

10 Q. Did you even negotiate an evaluation
11 including [REDACTED]?12 A. I can't remember. I don't -- I don't
13 think we made it that far.14 Q. Okay. Do you recall if [REDACTED]
15 was the one to say no to the deal or if Meta was
16 the one to say no to the deal?17 A. I think we just -- you know, I think
18 they had -- well, I don't completely recall it.19 But when I looked at the other
20 document, there was a pricing proposal. It
21 seemed like, from the document, that we thought
22 the pricing proposal was too high. I don't

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1 remember ever countering with a new pricing
2 proposal, so I imagine we just kind of went our
3 separate ways after that.

4 Q. Okay.

5 THE WITNESS: I'm going to need some --
6 a bite to eat soon.

7 MR. YOUNG: Yeah, let me -- well, let's
8 just go check on lunch real quickly.

9 If we can just go off the record
10 briefly and then...

11 THE VIDEOGRAPHER: Okay. We are off
12 the record at 11:56.

13 (Recess taken.)

14 THE VIDEOGRAPHER: We are now on the
15 record at 12:09.

16 MR. YOUNG: So during the break we
17 marked as Plaintiffs' 136 a document bearing
18 Meta_Kadrey_00152934.

19 (Whereupon, Exhibit 136 was
20 marked for identification.)

21 BY MR. YOUNG:

22 Q. Why don't you take a couple of moments

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1 STATE OF CALIFORNIA)

2 COUNTY OF LOS ANGELES) SS.

3 I, AUDRA E. CRAMER, CSR No. 9901, in and for the

4 State of California, do hereby certify:

5 That, prior to being examined, the witness named

6 in the foregoing deposition was by me duly sworn to

7 testify the truth, the whole truth and nothing but the

8 truth;

9 That said deposition was taken down by me in

10 shorthand at the time and place therein named, and

11 thereafter reduced to typewriting under my direction,

12 and the same is a true, correct and complete transcript

13 of said proceedings;

14 I further certify that I am not interested in the

15 event of the action.

16 Witness my hand this 21 day of November,

17 2024.

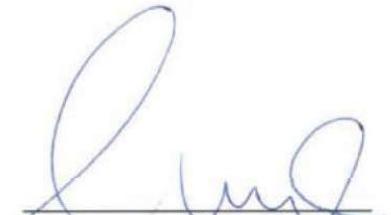
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Certified Shorthand

Reporter for the

State of California